UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 15 2015

CERTIFIED MAIL # 7009 1680 0000 7677 9128
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Todd Clemins
Human Resources Manager
Fortress Forms Inc.
2225 South 170th Street
New Berlin, Wisconsin 53151

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No. WID023385594

Dear Mr. Clemins:

On September 13, 2012, a representative of the U.S. Environmental Protection Agency inspected the Fortress Forms Inc. facility located in New Berlin, Wisconsin (FFI). As a large quantity generator of hazardous waste, FFI was subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate FFI's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by FFI, EPA's review of records pertaining to FFI, and the inspector's observations, EPA has determined that FFI has unlawfully stored hazardous waste without a license or interim status as a result of FFI's violation of certain requirements for a license exemption under Wis. Admin. Code § NR 662.034(1)-(3). More specifically, EPA has determined that FFI was a large quantity generator in 2011 and claimed to be a small quantity generator in 2012. EPA has identified the license exemption requirements violated by FFI as of the date of the inspection in paragraphs 1 - 5, below.

Also, EPA has determined that FFI violated RCRA requirements related to hazardous waste determinations and used oil and universal waste as described in paragraphs 6 and 7, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS

At the time of the inspection, FFI violated the following large quantity generator and small quantity generator license exemption requirements:

1. Date When Each Period of Accumulation Begins

Under Wis. Admin. Code § NR 662.034(1)(b) [40 C.F.R. § 262.34(a)(2)], a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins. This requirement for small quantity generators is found under Wis. Admin. Code NR § 662.192(1)(d)1 [40 C.F.R. § 262.34(d)(4)].

At the time of the inspection, FFI maintained sixteen (16) 55 gallon drums of used Safety-Kleen solvent that were not marked with the date upon which each period of accumulation of hazardous waste began.

2. Hazardous Waste Container Labeling

Under Wis. Admin. Code § NR 662.034(1)(c) [40 C.F.R. § 262.34(a)(3)], a large quantity generator must label or clearly mark each container holding hazardous waste with the words "Hazardous Waste." This requirement for small quantity generators is under Wis. Admin. Code § NR 662.192(4)2 and [40 C.F.R. § 262.34(d)(4)].

At the time of the inspection, FFI had accumulated sixteen (16) 55 gallon drums of used Safety-Kleen solvent that were not labeled with the words "hazardous waste." These drums were not labeled to indicate that they would be re-used. See pages 19, 20, 21, and 22 with photographs of drums identified to the inspector as containing used solvent in contrast to the drum labeled "Scrap Solvent Only" on page 15 of the inspection report. See pages 8, 9, 12, 13, 15, 23 and 24 of the inspection report for examples of FFI container (bucket) illegible labeling.

3. Use and Management of Containers

Under Wis. Admin. Code §§ NR 662.034(1)(a)1 and 665.0173(1) [40 C.F.R. §§ 262.34(a)(1)(i) and 265.173(a)], a large quantity generator must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste. Under Wis. Admin. Code §§ NR 662.192(1)(b) and 665.0173(1) [40 C.F.R. §§ 262.34(d)(2) and 265.173(a)], a small quantity generator must always keep a container holding hazardous waste closed during storage, except when it is necessary to add or remove waste.

At the time of the inspection, FFI did not keep its about 5-gallon buckets holding hazardous waste closed during storage, and waste was not being added or removed to these buckets while they were open. See pages 8, 9, 12, 13, 15, 23 and 24 for examples of FFI container labeling and management.

4. Contingency Plan

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0052 – 665.0056 [40 C.F.R. §§ 262.34(a)(4) and part 265, Subpart D – Contingency Plan and Emergency Procedures], FFI was required, in 2011 at a minimum, to: provide copies of the contingency plan and all updates to police, fire, hospital, and emergency response teams; amend the contingency plan as required; identify an emergency coordinator who meets all RCRA requirements; include all contingency plan components required; and to identify all emergency coordinator duties in the event of a fire, explosion, or discharge of hazardous wastes.

At the time of the inspection, FFI did not have a RCRA contingency plan that addressed releases of hazardous waste, included a map with the location of fire extinguishers and spill control equipment, or that identified an employee with the responsibility for coordinating all emergency response measures in the event of a discharge of hazardous waste such as notifying the National Response Center. The Emergency Action Plan provided by FFI is included in the inspection report on pages C-1 through C -5.

5. Personnel Training

Under Wis. Admin. Code §§ NR 662.034(1)(d) and 665.0016, [40 C.F.R. §§ 262.34(a)(4) and 265.16], FFI was required, in 2011 at a minimum, to provide a program of classroom instruction or on-the-job training that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. Following initial training within six months of being hired, annual refresher training is required for facility personnel managing hazardous waste.

At the time of the inspection, FFI provided the documents found at pages C-1 through C-9 of the inspection report. Training sign-in sheets from calendar year 2001 were the most recent available. The sign-in sheets were for fire training program and to shut off the main gas line to Fortress Forms buildings 1 and 2.

Summary: By violating the requirements for a license exemption, above, FFI became an operator of a hazardous waste storage facility, at a minimum in 2011, and was required to obtain a Wisconsin hazardous waste storage license. FFI failed to apply for such a license. FFI's failure to apply for and obtain a hazardous waste storage license violated the requirements of Wis. Admin. Code §§ NR 680.30, 680.31, and 680.32 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Paragraphs 4 and 5 above correspond to small quantity generator requirement under Wisc. Adm. Code §§ NR 662.192(1) [40 C.F.R. § 262.34(d)(5)].

OTHER VIOLATIONS

6. Hazardous Waste Determination

Under Wis. Admin. Code § NR 662.011 [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. Under Wis. Admin. Code § NR 662.040(3) [40 C.F.R. § 262.40], a generator is required to keep records of any test results, waste analyses, or other determinations made in accordance with the waste determination requirement for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal.

At the time of the inspection, FFI did not have available documents to demonstrate that used wipes pictured on pages 8, 9, and 24 of the inspection report were not regulated hazardous waste. (The spent solvent was identified with hazardous waste codes D001, D018, D039, and D040 so the wipes could also carry these waste codes.) A representative of FFI could not state with certainty whether the liquid in buckets was solvent in use to clean metal parts, used solvent to be reclaimed, spent solvent to be disposed, used oil to be recycled or spent oil to be disposed and whether it was hazardous. See buckets on pages 12, 13, 15, 16 and 23 of the inspection report. The Safety-Kleen Premium Solvent (Virgin and Recycled) Safety Data Sheet online identifies detectable amounts of benzene (CAS 71-43-2) and p-dichlorobenzene (CAS 106-46-7). These chemicals could cause waste to exhibit the characteristic of toxicity for benzene (D018) and 1,4-dichlorobenzene (D027). FFI therefore violated the above-referenced generator requirement.

7. Used Oil Requirement

Under Wis. Admin. Code § NR 679.22(3)(a) [40 C.F.R. § 279.22(c)(1)], containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

At the time of the inspection, at least one container of used oil was not labeled "Used Oil." The red drip tray shown on page 12 of the inspection report was not labeled. All of the buckets observed during the inspection contained dark oily liquid in contrast to the "Liquid, clear, colorless to pale yellow" appearance of Safety-Kleen Premium Solvent (Virgin and Recycled) described on the Safety-Kleen Data Sheet online.

At this time, EPA is not requiring FFI to apply for a Wisconsin hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption applicable to small quantity generators or large quantity generators of hazardous waste. In addition, EPA recognizes FFI's desire to be a small quantity generator rather than a large quantity generator.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, which you have taken since the inspection to establish compliance with the above conditions for a permit exemption, hazardous waste determination requirement, and used oil requirement. You should submit your response to Ms. Sue Brauer, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sue Brauer, of my staff, at (312) 353-6134 or at brauer.sue@epa.gov.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WI DNR, Michael.Ellenbecker@wisconsin.gov

U. S. Environmental Protection Agency
Region 5, Land and Chemicals Division
RCRA Branch
77 West Jackson Boulevard
Chicago, Illinois 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Fortress Forms Inc.

EPA ID NUMBER: WID023385594

ADDRESS: 2225 S 170th Street
New Berlin, Wisconsin 53151

DATE OF INSPECTION: September 13, 2012

EPA INSPECTOR: Sue Rodenbeck Brauer
Environmental Scientist

PREPARED BY: Sue Rodenbeck Brauer Sept. 27, 2013
Sue Rodenbeck Brauer — Date
Compliance Section 2

ACCEPTED BY: _____ 10/18/2013
Julie Morris, Chief — Date
Compliance Section 2

Purpose of Inspection
This inspection was an evaluation of Fortress Forms Inc.'s compliance with hazardous waste regulations found at Wisconsin Administrative Code (WAC) Chapter NR Parts 660-679 and Title 40 of the Code of Federal Regulations (40 CFR) Parts 260-279. The state inspector was not present. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site is identified in RCRA Info as a large quantity generator (LQG) as of February 27, 2008. A second EPA ID number (WID006106462) is assigned to the same company name at the same location. The latter EPA ID number was categorized as a small quantity generator by the Implementer of Record as of November 1, 2011.

Participants

Inspector(s):
Sue Rodenbeck Brauer, Environmental Scientist, EPA

Site Representative(s):
Mr. Todd Clemins, Human Resources Manager
Mr. Richard J. Clemins, Owner
Gary Farris, Head Supervisor
Steve Radosvic, Ryerson Plant
Leon Seese, Co-Safety Coordinator
Robert Vogt, Purchasing Agent

Introduction
On September 13, 2012, I arrived at the site at 9:50 a.m. I drove around the building and observed no drums outside. At 9:55 a.m., I entered the building vestibule. I introduced myself and provided a business card to office staff. Mr. Todd Clemins introduced himself and was the primary facility representative during the inspection. Mr. Todd Clemins facilitated the records review by providing documents requested and accompanied me on the facility tour. Mr. Clemins explained his stress level by saying that his 92-year old father, who started the business and was actively involved prior to surgery one and a half months ago, was in a residential rehabilitation facility and may be released soon. I told Mr. Clemins that I was familiar with eldercare issues. Mr. Richard J. Clemins, brother of Mr. Todd Clemins, is the owner and is active mostly in sales. Mr. Todd Clemins further explained that at one time, two companies operated at this location. Fortress Manufacturing is inactive now. I provided a Small Business Resources information sheet and the Solid and Hazardous Waste Education Center trifold brochure to Mr. Todd Clemins.

Fortress Forms Inc had 58 employees at the time of the inspection, 5 part-time and 53 full-time. The inspection was performed during first shift, 7:00 a.m. to 3:30 p.m. Only four people work the second shift, from 3:30 p.m. to 1:00 a.m. The second shift is used for wire forming such as wires to tie rebar in place for manufacture of concrete pipes.

Fortress Forms Inc. uses several metalworking processes in its metal forming and treatment (NAICS 332618) business. Cold heading machines are used to form soft wire of ¾ inch diameter blanks. Foil baking pans (e.g., for inexpensive turkey roasters) are shaped around a cold headed

blank. Some used oil from cold heading can be reused while others can't be reused. The oil is formulated for particular metal and machine applications. Screw machine oil can be reused over and over.

I informed Mr. Todd Clemins that Fortress Forms could claim any information gathered during the inspection as Confidential Business information. Fortress Forms did not make a CBI claim on the information gathered during the inspection

Site Tour

I observed facility operations including metal parts manufacturing, satellite accumulation areas and product, in-use material, and waste storage areas. I took photographs of the some of the waste-generating machines, general maintenance and operation of the facility, and waste storage/accumulation areas during the site tour. The photographs are included in Attachment A.

Mr. Todd Clemins did not provide a facility map prior to the site tour. He described the different types of metal part manufacturing machines as we passed each (cold heading, wire forming, hydraulic press, banner welding, and punch press). Throughout the facility, buckets are used for scrap parts, solvent (e.g., 360 Solvent from Univar or Safety-Kleen), and used oil. Mr. Todd Clemins stated that the cold heading oil and screw machine oil could become hazardous waste. Shop rags are sent to a laundry. As shown in photographs, the buckets were not labeled with terms defined by RCRA regulation (e.g., "hazardous waste," "used oil") or with chemical names of the contents.

Records Review

I gave Mr. Todd Clemins a list of documents that I wanted to review. The list is included in Attachment B.

- He provided annual waste reports that showed a considerable decline in the amount of hazardous waste generated, possibly due to working with Safety-Kleen and solvent reuse. The 2012 report for calendar year 2011 shows small quantity generator status. By way of contrast, the facility generated 161,040 pounds of F005 (Wisconsin hazardous waste code for used oil with a total halogen concentration over 1000 ppm in 2007). A February 17, 2011 printout identifies the cold heading machine oil as Universal Waste. Fortress Forms tried using citrus-based solvent to reduce the cost of manufacturing.
- Mr. Leon Seese provided training documents for review, including for machine guarding, safety, fork lift, shipping, tanks, and lock out/tag out. I observed a 'Written Hazard Communication Program" dated 10/20/97. This document relies on the MSDS for procedures for cleaning up spills and leaks and emergency first aid.
- I reviewed manifests and used oil tracking records for the 2010 and 2011 calendar years. The following table contains some information from these records.

Manifest Tracking Number	Generator Transporter Designated Facility Signed Dates	Designated Facility	Waste Codes	Waste Description	LDR Notice (Y/N) UHCs? (Y/N)

Manifest Tracking Number	Generator Transporter Designated Facility Signed Dates	Designated Facility	Waste Codes	Waste Description	LDR Notice (Y/N) UHCs? (Y/N)
001950884	2/9/10 2/9/10 2/9/10	Safety-Kleen Wauconda WID981097769	D001 D018 D039 D040	waste combustible liquid 36 drums	Y Y
001950869	2/5/10 2/5/10 2/5/10	Safety-Kleen Wauconda WID981097769	D001 D018 D039 D040	waste combustible liquid 12 drums	Not Noted
41713	2/25/11	Jensen Env. Man. Inc. WIR000004515[1]	Nonhaz	Used sorbents, 2 drums	Not Noted
42079	4/26/11	Jensen Env. Man. Inc.	Not Noted	Used absorbents, 2 drums	Not Noted
Not Noted	5/12/11	Safety-Kleen	Not Noted	360 solvent for recycle 1650 g (3 totes 550 gal each).	Not Noted
Not Noted	5/24/11	Safety-Kleen	Not Noted	Tote service bin waste	Not Noted
Not Noted	5/31/11	Safety-Kleen	Not Noted	6 drums used oil for recycle	Not Noted
Not Noted	7/7/11	Safety-Kleen	Not Noted	6 drums sorbent mixture; 1 oil filter; 330 gal. tote	Not Noted
Not Noted	8/18/11	Safety-Kleen	Not Noted	6 drums oil filter; oil abs. 107 drums	Not Noted
Not Noted	9/29/11	Safety-Kleen	Not Noted	1 tote, 330 gal. used oil; 6 drums oil absorbent	Not Noted
Not Noted	10/10/11	Safety-Kleen	Not Noted	1705 used cleaning cmpds	Not Noted
Not Noted	11/21/11	Recycle Technologies Inc.	Not Noted	Electronic waste	Not Noted

[1] EPA ID number obtained from RCRA Info on 9/13/13.

Manifest Tracking Number	Generator Transporter Designated Facility Signed Dates	Designated Facility	Waste Codes	Waste Description	LDR Notice (Y/N) UHCs? (Y/N)
Not Noted	11/22/11	Safety-Kleen	NA	1 used oil filter 330 gal. tote; 8 drums of crushed oil filters & absorbent waste bin	Not Noted
003299979		Safety-Kleen	D001 D018 D039 D040	1650 recycle combustible liquid	Y Y

- In response to my request for a contingency plan, I received an Emergency Action Plan. It is in Attachment C.
- No training records specific to RCRA were produced.

Closing Conference

I summarized the waste determination, labeling and training issues identified during the inspection. The inspection concluded at approximately 2:30 p.m.

Attachments

A. Photographs and Log
B. List of Documents Requested
C. Document(s) Copied
    a. Emergency Action Plan,
    b. Cintas Compliance Awareness, dated 11/8/2011, 1 p.
    c. Fire Training Program Sign Up Sheets (2) dated 9/13/00
    d. Main Gas Shut Off Training (January 2001), 1p.
D. Checklist

ATTACHMENT A
Photographs and Log

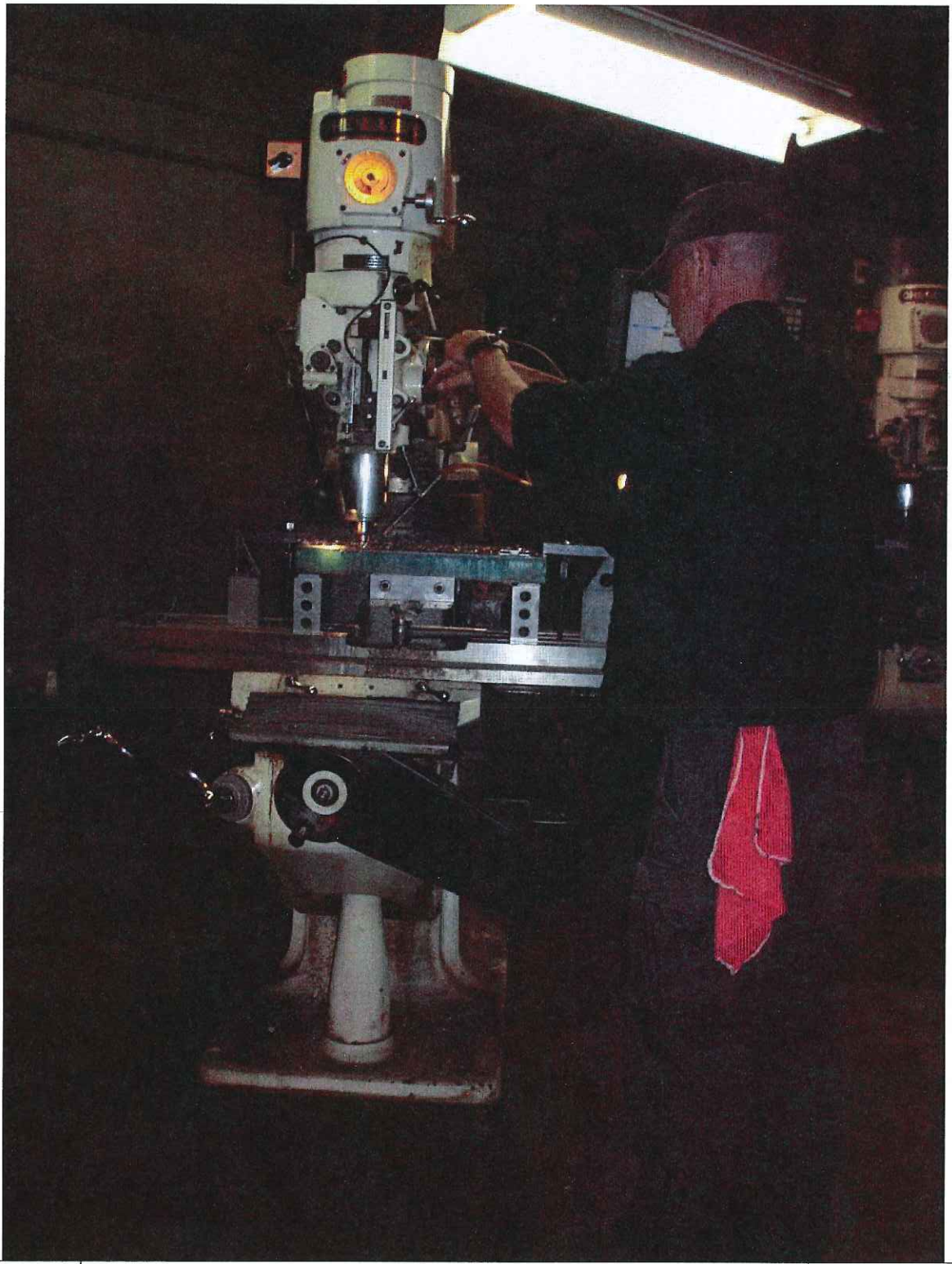
RCRA Inspection Photo-Log
Photographer: Sue Rodenbeck Brauer
Location: Fortress Forms, Inc., EPA ID No. WID023385594
Date(s): September 13, 2012
Notes:

Photo #	Description	Time
P9120101	View of Fortress Forms Inc. Headquarters from street. Building to the right is also Fortress Forms-operated. Pavement at photo bottom and sky at photo top were cropped.	9:49 a.m.
P9120102	Launderable wipe was used with solvent and placed in a fire-proof can. Can is not fire-proof without the lid.	11:44 a.m.
P9120103	Can used for spent launderable wipes. Can does not close, rendering it no longer fire proof.	11:44 a.m.
P9120104	This die-cutting machine has a cool mist spray from the machine's fluid reservoir (yellow box, yellow tubes with silver ends below the worker's hands) with a capacity of about 2 liters.	11:46 a.m.
P9120105	Representative fire extinguisher with needle in green zone. Last inspected by Cintas in February 2011.	11:47 a.m.
P9120106	The drip tray is labeled with the company name but not "used oil."	11:56 a.m.
P9120107	This is an example of several unlabeled buckets near machines that have been recently used.	11:57 a.m.
P9120108	Red bucket of dark liquid, probably solvent according to Mr. Todd Clemins, labeled "scrap."	11:58 a.m.
P9120109	Red bucket is labeled SCRAP.	11:58 a.m.
P9120110	Safety Kleen Parts Cleaning Solvent, one label on top of another	12:00 p.m.
P9130111	"Scrap solvent only" and "full" labels were not used on other drums.	12:00 p.m.
P9130112	The open bucket is not labeled. The drum of recycled product on the right is equipped with a dispenser. The drum labeled "scrap solvent only" is for used solvent.	12:00 p.m.
P9130113	Mr. Clemins explained that efforts have been made to label buckets, but it's difficult to maintain. Labels are for 360 solvent.	12:08 p.m.
P9130114	Certificate of Recycling from Recycle Technologies, Inc.	12:50 p.m.
P9130115	Newspaper clipping dated June 15, 1995. Business started 1962.	1:41 p.m.
P9130116	According to Mr. Todd Clemins, the eight drums on pallets and eight drums on the floor are used Safety-Kleen solvent.	1:53 p.m.
P9130117	Used Safety-Kleen solvent with virgin product label.	1:53 p.m.
P9130118	Close up of label shown in P9130117.	1:53 p.m.
P9130119	"Dirty Solvent Only" funnel next to drum of recycled product	1:55 p.m.
P9130120	More legible shot of funnel	1:56 p.m.
P9130121	Bucket with dirty solvent old label illegible	1:59 p.m.
P9130122	Metal forming machine generating spent metalworking fluid	1:59 p.m.
P9130123	Spent solvent wipe in formerly fire-proof can.	2:11 p.m.

P9120101	View of Fortress Forms Inc. Headquarters from street. Building to the right is also Fortress Forms-operated. Pavement at photo bottom and sky at photo top were cropped.	9:49 a.m.

P9120102	Launderable wipe was used with solvent and placed in a fire-proof can. Can is not fire-proof without the lid.	11:44 a.m.

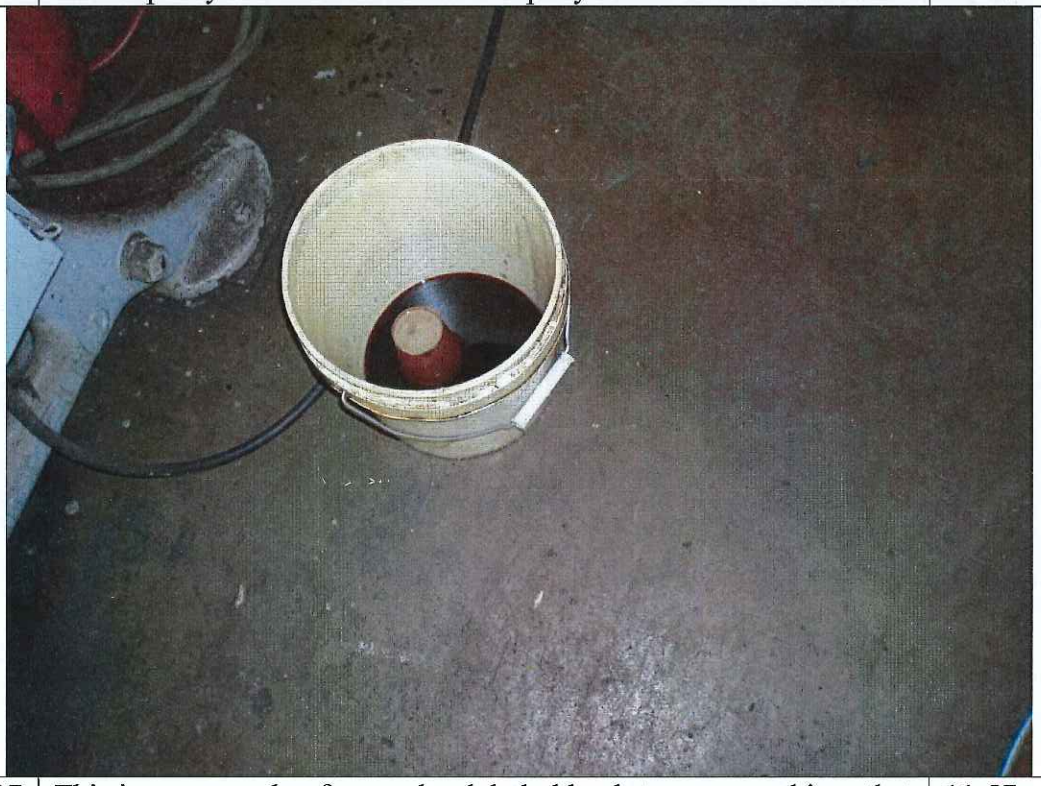
P9120103	Can used for spent launderable wipes. Can does not close, rendering it no longer fire proof.	11:44 a.m.



P9120104	This die-cutting machine has a cool mist spray from the machine's fluid reservoir (yellow box, yellow tubes with silver ends below the worker's hands) with a capacity of about 2 liters.	11:46 a.m.

P9120105	Representative fire extinguisher with needle in green zone. Last inspected by Cintas in February 2011.	11:47 a.m.

P9120106	The drip tray is labeled with the company name but not "used oil."	11:57 a.m.



P9120107	This is an example of several unlabeled buckets near machines that have been recently used.	11:57 a.m.

P9120108	Red bucket of dark liquid, probably solvent according to Mr. Todd Clemins, labeled "scrap."	11:58 a.m.

P9120109	Red bucket is labeled "SCRAP."	11:58 a.m.

P9120110	Safety Kleen Parts Cleaning Solvent, one label on top of another	12:00 p.m.

P9130113	Mr. Clemins explained that efforts have been made to label buckets, but it's difficult to maintain. Labels are for 360 solvent.	12:08 p.m.

P9130111	"Scrap solvent only" and "full" labels were not used on other drums.	12:00 p.m.

P9130112	The open bucket is not labeled. The drum of recycled product on the right is equipped with a dispenser. The drum labeled "scrap solvent only" is for used solvent.	12:00 p.m.

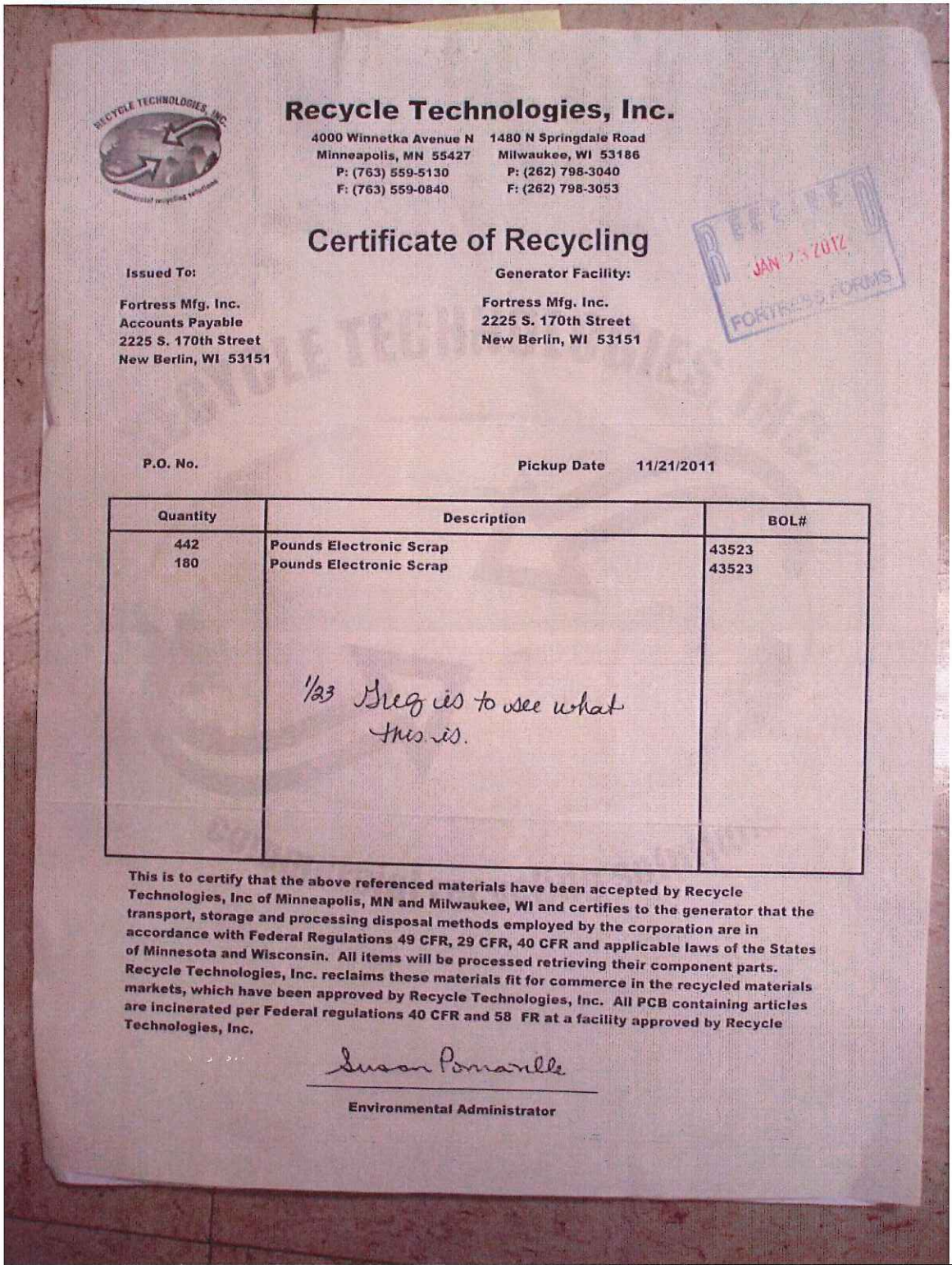
It's Father's Day in the living room *and* the board room

Businesses benefit from close family ties

By Dustin Rowe
Staff Writer

"My father demands the best from us."
Todd Clemins

P9130115	Newspaper clipping dated June 15, 1995. Business started 1962.	1:41 p.m.



Recycle Technologies, Inc.

4000 Winnetka Avenue N
Minneapolis, MN 55427
P: (763) 559-5130
F: (763) 559-0840

1480 N Springdale Road
Milwaukee, WI 53186
P: (262) 798-3040
F: (262) 798-3053

RECEIVED JAN 23 2012 FORTRESS FORMS

Certificate of Recycling

Issued To:

Fortress Mfg. Inc.
Accounts Payable
2225 S. 170th Street
New Berlin, WI 53151

Generator Facility:

Fortress Mfg. Inc.
2225 S. 170th Street
New Berlin, WI 53151

P.O. No.

Pickup Date 11/21/2011

Quantity	Description	BOL#
442	Pounds Electronic Scrap	43523
180	Pounds Electronic Scrap	43523

1/23 Greg is to see what this is.

This is to certify that the above referenced materials have been accepted by Recycle Technologies, Inc of Minneapolis, MN and Milwaukee, WI and certifies to the generator that the transport, storage and processing disposal methods employed by the corporation are in accordance with Federal Regulations 49 CFR, 29 CFR, 40 CFR and applicable laws of the States of Minnesota and Wisconsin. All items will be processed retrieving their component parts. Recycle Technologies, Inc. reclaims these materials fit for commerce in the recycled materials markets, which have been approved by Recycle Technologies, Inc. All PCB containing articles are incinerated per Federal regulations 40 CFR and 58 FR at a facility approved by Recycle Technologies, Inc.

Susan Pomaville

Environmental Administrator

P9130114	Certificate of Recycling from Recycle Technologies, Inc.	12:50 p.m.

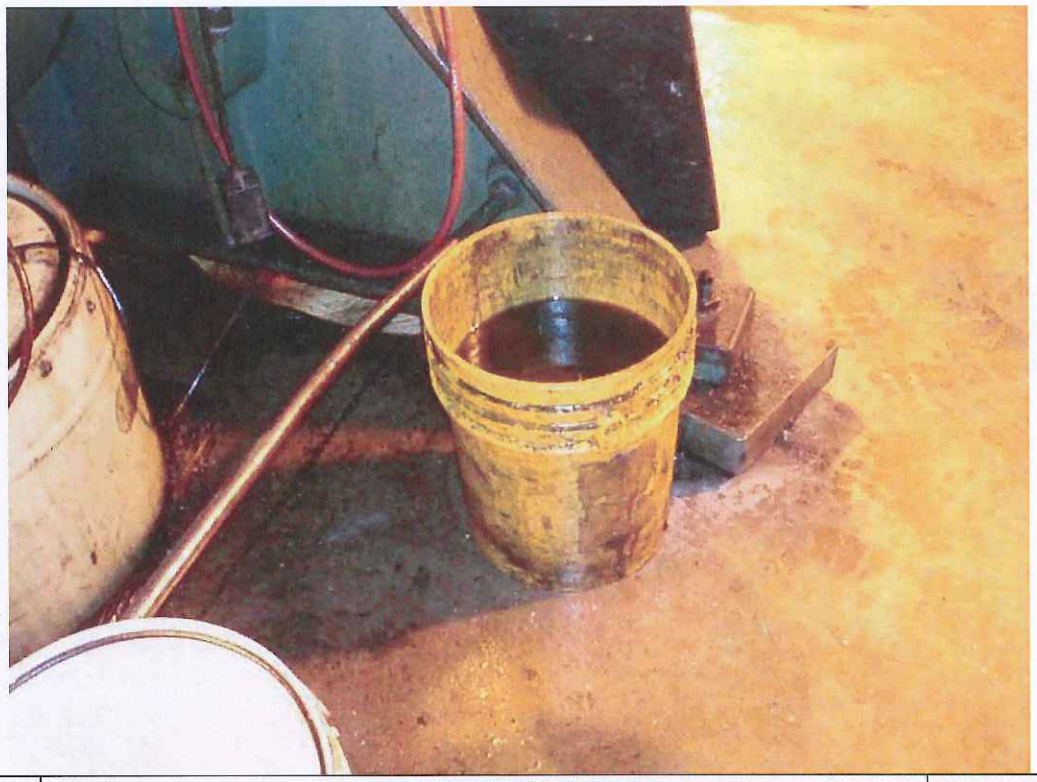
P9130117	Used Safety-Kleen solvent with virgin product label.	1:53 p.m.

P9130116	According to Mr. Todd Clemins, the eight drums on pallets and eight drums on the floor are used Safety-Kleen solvent.	1:53 p.m.

P9130119	"Dirty Solvent Only" funnel next to drum of recycled product	1:55 p.m.

P9130120	More legible shot of funnel	1:56 p.m.

P9130118	Close up of label shown in P9130117.	1:53 p.m.



P9130121	Bucket with dirty solvent old label illegible	1:59 p.m.

P9130122	Metal forming machine generating spent metalworking fluid	1:59 p.m.

P9130123	Spent solvent wipe in formerly fire-proof can.	2:11 p.m.

ATTACHMENT B
List of Documents Requested

CESQG	SQG	LG	Documentation to be Reviewed
			1. All manifests/shipping papers for hazardous waste, used oil, and universal waste for the past three years
No LDR unless acute toxic			2. All land disposal restriction forms (LDRs) for past three years
261.5(f) & 261.5(g)			3. Waste analysis data for all waste streams listed on annual report and any other waste determinations that might have been done
	262.34(d)		4. Hazardous waste contingency plan
			5. Emergency equipment inspection logs
			6. Inspection logs for accumulation areas – weekly for containers, daily for tanks
			7. Generator closure documentation, if applicable
			8. Personnel training program and documentation
			9. List of all employees who manage hazardous waste
			10. Job titles and descriptions of employees who handle hazardous waste
			11. Annual report for past three years
	265.201		12. Tank system documentation, if available: a. written assessment attesting that the design, installation and structural integrity of the system is adequate for the management of hazardous waste b. written statements by those persons who supervised installation or certified design of the system, that the system was properly installed and designed and that required repairs were performed. c. any documentation in regard to any leaking of the tank, quantity leaked, its repair and notification (if any) to the director of the Ohio EPA d. any documentation in regard to secondary containment design/operation/installation e. daily inspection logs

* air permit
+wastewater permit

SRB rev. 01/12/2012

ATTACHMENT C
Document(s) Copied

EMEMERGENCY ACTION PLAN

THIS EMERGENCY PROCEDURE/EVACUATION PLAN HAS BEEN ESTABLISHED FOR:

FORTRESS FORMS INC.

IN THE EVENT OF FIRE, GAS LEAK, TORNADO, FLOOD, OR BOMB THREAT PLEASE FOLLOW THESE PROCEDURES:

1. ALERT

A. AUTHORIZATION TO EVACUATE WILL BE GIVEN BY THE TEAM LEADER. AFTER THE ORDER TO EVACUATE IS GIVEN, THE TEAM COORDINATOR OR A MEMBER OF HIS TEAM WILL SOUND THE EVACUATION ALERT.THIS ALERT OR SIGNAL WILL BE A DISTINCT ALARM THAT IS NOT CONFUSED OR USED FOR ANY OTHER PURPOSE.

C. THE EMERGENCY SIGNAL WILL BE GIVEN BY MAKING AN ANNOUNCEMENT USING THE BULLHORN TO ALERT ALL PERSONNAL OF THE NATURE OF THE EMERGENCY. AT THAT TIME ALL PERSONNEL WILL FOLLOW THE EMERGENCY PROCEDURE REQUIRED WHEN DEALING WITH THAT PARTICULAR EMERGENCY. IN ACCORDANCE WITH THEIR TRAINNING.

D. IN THE EVENT OF ANY EMERGENCY SITUATION, THE APPROPRIATE EMERGENCY COORDINATOR SHOULD IMMEDIATELY BE ADVISED OF THE LOCATION AND NATURE OF THE EMERGENCY AND NOTIFY THE PROPER AUTHORITIES.

EMERGENCY COORDINATOR PLANT 1 - LEON SEESE,GARY FARRIS,OR GREG BLOHM
EMERGENCY COORDINATOR PLANT 2 - TODD CLEMINS,ED MOORE, ORMARK FABER

D. EMERGENCY TELEPHONE NUMBERS: (911)

FIRE DEPARTMENT :	[911]
POLICE DEPARTMENT:	[911]
AMBULANCE :	[911]
ELECTRIC COMPANY :	1-800-662-4797
GAS COMPANY :	1-800-261-5325

2. SHOP AREA SHUT DOWN PROCEDURES

IN THE EVENT THAT THE EMERGENCY SITUATION MAKES IT NECESSARY TO TURN OFF THE MAIN GAS, OXYGEN, OR DE-ENERGIZE ELECTRICAL POWER, THE FOLLOWING PROCEDURE WILL BE FOLLOWED:

THE MAINTAINCE MAN WILL TURN OFF THE NATURAL GAS, AND MAIN BREAKERS IN THE PLANT IF AT ALL POSSIBLE. FOR THE AFFECTED AREAS.

MAIN GAS VALVE LOCATION PLANT 1:

_____

MAIN GAS VALVE LOCATION PLANT 2:

_____

EMERGENCY SHUTDOWN PROCEDURE CONT.

MAIN BREAKERS LOCATION PLANT 1:

_____

MAIN BREAKERS LOCATION PLANT 2:

_____

3. AREAS OF EVACUATION

IN THE EVENT OF EVACUATION, EACH DEPARTMENT WILL REPORT TO THE FOLLOWING AREAS WITHIN THE EMPLOYEES PARKING LOT TO BE ACCOUNTED FOR. DEPARTMENT SUPERVISORS WILL BE RESPONSIBLE FOR PROVIDING A SIGN-UP SHEET TO ENSURE ALL PERSONNEL ARE PRESENT AND ACCOUNTED FOR.

BUILDING 1: CENTER OF PARKING LOT TOWARD 170TH ST._____

BUILDING 2: CENTER OF PARKING LOT TOWARD 170TH ST._____

SEVERE WEATHER:

IN THE EVENT OF TORNADO OR SEVERE WEATHER, AND IF TIME ALLOWS, FOLLOW THE SHOP AREA SHUT DOWN PROCEDURE. THE TEAM COORDINATOR WILL HAVE A RADIO TO KEEP UP WITH CURRENT INFORMATION AND WARNINGS FOR TORNADOES, BLIZZARDS,ECT.

SHOP PERSONNEL WILL MOVE TO:

BUILDING 1: CENTER OF BUILDING NEAR HEADING DEPT.

BUILDING 2: AREA BETWEEN LUNCH ROOM AND SHOP AREA.(ED'S OFFICE AREA).

OFFICE PERSONNEL WILL MOVE TO:

BUILDING 1: CENTER OF BUILDING NEAR HEADER DEPARTMENT.

BUILDING 2: ACCOUNTING ROOM AREA

"ALL CLEAR" WILL BE ANNOUNCED WHEN THE EMERGENCY HAS ENDED.

4. RESPONSIBLE PERSONNEL:

TEAM LEADER BUILDING 1: EACH DEPARTMENT SUPERVISOR IS RESPONSIBLE FOR THEIR ASSIGNED PERSONNEL. IN THE EVENT THAT DEPARTMENT SUPERVISOR IS NOT PRESENT THE SENIOR SETUP PERSON WILL PRESUME RESPONSIBILITY. THEY IN TURN WILL REPORT TO THE EMERGENCY RESPONSE COORDINATOR.

TEAM LEADER BUILDING 2: EACH DEPARTMENT SUPERVISOR IS RESPONSIBLE FOR THEIR ASSIGNED PERSONNEL.IN THE EVENT THAT DEPARTMENT SUPERVISOR IS NOT PRESENT THE SENIOR SETUP PERSON WILL PRESUME RESPONSIBILITY. THEY IN TURN WILL REPORT TO THE EMERGENCY RESPONSE COORDINATOR

EMERGENCY RESPONSE COORDINATOR:

A. 1ST SHIFT LEON SEESE,TODD CLEMINS,OR GREG BLOHM

2ND SHIFT KEVIN CLEMINS,STEVE BLUE, OR RAUL RAMIREZ

B. COORDINATOR DUTIES:

1. ASSESS THE SITUATION

2. DIRECT ALL EFFORTS

3. ENSURE OUTSIDE EMERGENCY SERVICES ARE CALLED

4. DIRECT SHUTDOWN PLANT OPERATIONS

C. A PRIORITY LIST WILL BE KEPT BY THE RECEPTIONIST AND AT ALL THE SUPERVISOR'S DESKS. THOSE PEOPLE ARE TO BE NOTIFIED IN THE EVENT OF AN EMERGENCY EVACUATION.

D. TREATMENT OF INJURIES WILL BE HANDLED BY A TRAINED FIRST AID RESPONDER UNTIL PROFESSIONAL MEDICAL TREATMENT IS AVAILABLE.

5. CHEMICAL SPILLS

IF LIQUID SPILL, AVOID CONTACT WITH CHEMICAL. REFER TO MATERIAL SAFETY DATA SHEETS (MSDS) TO DETERMINE APPROPRIATE CLEAN UP ACTION AND POTENTIAL HAZARD.

IF A RELEASE OF TOXIC AND/OR FLAMMABLE GAS, IMMEDIATLY CONTACT THE APPROPRIATE EMERGENCY COORDINATOR AND EVACUATE THE AREA IN ACCORDANCE WITH THE EVACUATION PLAN.

6. TRAINING OF PERSONNEL

IN ORDER TO ENSURE A SAFE AND ORDERLY EVACUATION OF EMPLOYEES,ALL SUPERVISORS WILL BE TRAINED TO ASSIST IN EMERGENCY PROCEDURES.

ALL OTHER EMPLOYEES WILL BE TRAINED IN THE PROPER EMERGENCY PROCEDURES WHICH INCLUDE INITIAL IMPLEMENTATION OF THE PLAN, WHENEVER THE PLAN CHANGES FOR ANY REASON OR WHENEVER EMPLOYEES ARE TRANSFERED OR ASSIGNED REVISED RESPONSIBILITIES.

FLOOR PLAN:

IN THIS SPACE PROVIDED IN THE NEXT SEVERAL PAGES, A COMPLETE DRAWING OF EACH PLANT WILL BE SHOWN WITH ALL EVACUATION ROUTES, ALL EXITS, LOCATION OF GAS VALVES, MAIN BREAKERS. ALSO SHOWING THE AREA OUTSIDE WHERE EMPLOYEES WILL ASSEMBLE AFTER EVACUATION AND THE INSIDE AREA FOR ASSEMBLY IN CASE OF SEVERE WEATHER.

CINTAS FIRE PROTECTION

Compliance Awareness

CUSTOMER COPY

Location: CINTAS FAS LOCKBOX 636525
Route: 23

Receipt No.:	0F36529013
Receipt Date.:	11/08/2011
Payment Terms:	NET 10 DAYS
Customer No.:	3659
Receipt Type:	CHG-S
PO Number:	F-40831
Service Visit No.:	1414785

Remit To:
CINTAS FAS LOCKBOX 636525
P.O. BOX 636525
CINCINNATI, OH 452636525
(262)781-9665

Bill To:
FORTRESS FORMS INC
ATTN: LEON SEESE
2225 S 170TH ST
NEW BERLIN, WI 53151

Serviced:
FORTRESS FORMS BLDG #2
16000 W RYERSON RD
NEW BERLIN, WI 53151

WHILE SERVICING YOUR FIRE PROTECTION EQUIPMENT, WE CONDUCTED A COMPLIMENTARY REVIEW OF YOUR FACILITY TO CHECK FOR POTENTIAL DEFICIENCIES WITH CODE COMPLIANCE. ONLY THE DEFICIENCIES THAT WERE READILY OBSERVABLE ARE NOTED BELOW. CINTAS RECOMMENDS THAT YOU TAKE IMMEDIATE ACTION TO CORRECT ANY DEFICIENCIES NOTED.

THE REVIEW IS NOT INTENDED TO REPLACE A FORMAL AND COMPREHENSIVE CODE COMPLIANCE SURVEY OF YOUR ENTIRE PREMISES. IT IS DESIGNED TO BRING YOUR ATTENTION TO POSSIBLE DEFICIENCIES WITH YOUR CURRENT FIRE PROTECTION PROGRAM AND HIGHLIGHT PRODUCTS AND SERVICES THAT COULD ENHANCE YOUR ORGANIZATION'S FIRE PREVENTION AND SAFETY PLAN.

Item	Compliance Issues Noted
CAR05	MONTHLY INSPECTION REQUIRED ON EXTINGUIHERS/FIRE HOSE (NFPA 10/NFPA 1962)

PLEASE CALL US AT THE NUMBER SHOWN ABOVE IF YOU HAVE ANY QUESTIONS REGARDING THIS REPORT, OR IF YOU WOULD LIKE US TO HELP YOU CORRECT ANY OF THE ISSUES NOTED.

Surveyed by: Scott Holbrook
Date Completed: 11/08/2011

C-6

Thank You for Your Business

Customer acknowledges that all work has been completed and that all work is subject to the Terms and Conditions indicated on the reverse hereof.

TERMS NET 10

(2)

AUTOMATIC FIRE PROTECTION, INC.

ISO 9002 CERTIFIED

Sept 13 2000

Fire Training Program
Sign Up Sheet

Company Name: Fortress

Date of Training: 9/13/00

Employee Name	Department	
Gerald Libby Jr	75	Gerald Libby Jr.
Chuck Meller	75	Chuck Meller
Bob Anderson	75	BOB ANDERSON
JoAnn Gregor	95	JOANN Gregor
Rose Constable	25	Rose Constable
ROBERT A VOGT.	15	Robert Vogt
Carmelita Stehr	15	Carmelita Stehr
STEVE FOUNTAIN	15	Steve Fountain
LARRY GLOVER	85	Larry Glover
JOSÉ BERNAL	85	Jose Bernal
Art Rodriguez	75	Art Rodriguez
Mike Asman	85	Mike Asman
Doug Jaskie	95	Doug Jaskie
Pedro Velazquez	85	Pedro Velazquez
Jerry Smith	75	Jerry Smith
Mike Jones	75	Mike Jones
Dale Radtke	75	Dale Radtke

3265 North 126th Street • Brookfield, WI 53005, U.S.A. • (414)781-9665 • (800)686-9665 • FAX: (414)781-1152 • www.autofire.com

(2) (3)

AUTOMATIC FIRE PROTECTION, INC.

ISO 9002 CERTIFIED

Fire Training Program
Sign Up Sheet

Company Name: FORTRESS

Date of Training: 9/13/00

Employee Name	Department
Gary Dieringer	85 Gary Dieringer
Tina Holberg	55 Tina Holberg
Anne Beitzel	95 Anne Beitzel
Keith Lewis	55 Keith Lewis
Keith Grant	55 Keith Grant
GARY FARRIS	85 Gary Farris
Patricia Williams	95 Patricia Williams
Sylvester Jackson	55 Sylvester Jackson
Leon Seese	15 Leon Seese
Jose Tovar	55 Jose Tovar
Isidro Atilano	55 Isidro Atilano
WALDO O. URIARTE	55 Waldo Uriarte
Luis Rodriguez	55 Luis Rodriguez
Joe Kube	75 Joe Kube
James Smith	55 James Smith
TODOR VULIC	55 Todor Vulic
Kevin Clemins	55 Kevin Clemins
Joy Hahn	55 Joy Hahn
Terry Johnson	55 Terry Johnson
Tom Behrs	95 Tom Behrs
Kelly Reyes	95 Kelly Reyes
Greg Blohm	Greg Blohm

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THE FOLLOWING PEOPLE HAVE BEEN TRAINED

TO SHUT OFF MAIN GAS LINE

TO FORTRESS BUILDINGS 1 & 2

TRAINING COMPLETE JAN. OF 2001

JIM THOMAS
BOB ANDERSON
BRIAN DARY
DOUG JASKIE
GARY FARRIS
PEDRO VELAZQUEZ
KEVIN CLEMINS
JIM SMITH
GERRY SMITH
AL PODOLL
JIM HOTVEDT
ED MOORE
MARK FABER

GREG BLOHM
LEON SEESE
THOR GUDELL
JOE KUBE
CHUCK MELLOR
DALE RADKE
JERRY LIBBY

ATTACHMENT D
Checklist

FORTRESS FORMS

LARGE QUANTITY GENERATOR INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated. No analyses	Y	662.011 Photo☐
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used. as can best be determined	UN	662.011(3) Photo☐
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	N	662.011(3)(a)1 Photo☐
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	N	662.040(3) Photo☐
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012 Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste. TBD All haz. waste	ND	662.020(1) Photo☐
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1) Photo☐
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2) Photo☐
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	NI	662.023(3) Photo☐
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	NA	662.020(1) Photo☐
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	N	662.034(13) Photo☐
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	NA	662.034(13) Photo☐
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1) Photo☐
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1) Photo☐
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	ND	662.030 Photo☐

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	ND	662.031 Photo ☐
L. Hazardous waste is marked according to applicable DOT requirements before transport.	ND	662.032(1) Photo ☐
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	ND	662.032(2) Photo ☐
N. Placards are offered to the initial transporter.	ND	662.033 Photo ☐

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo ☐
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo ☐
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment. W each shipment	Y	668.07(1) Photo ☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo ☐
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	NA	668.07(1) Photo ☐
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions. no treatment prohibitions	N	668.07(1) Photo ☐
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo ☐
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo ☐
I. Generator identifies EITHER of the following when the waste is both a listed and characterisitic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes. N	NA	668.09(2) Photo ☐
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	NA	662.034(1)(d) Photo ☐

Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year. not timely submitted	N	662.041 Photo☐
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	NA	662.042(1) Photo☐
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	NA	662.042(2) Photo☐
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2) Photo☐

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, ~~2 way radio~~). Y 2. Internal communications and alarm systems. non sprinklered, no pull alarms 3. Portable fire extinguishers. Y 4. Fire control equipment, including special extinguishing equipment. not inspected since Feb 2011 by Cintas 5. Spill control equipment. oil absorbent pads 6. Decontamination equipment (e.g., eyewash, shower). eye wash in other bldg. 7. Water at adequate volume and pressure to supply water spray systems. NA CINTAS reported to FFI absence of monthly insp.	Y	662.034(1)(d) Photo☐
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033). ⊕ See Comments above	"	662.034(1)(d) Photo☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034). phone	Y	662.034(1)(d) Photo☐
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency. It's been a while since trained.	N	662.034(1)(d) Photo☐
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	N	662.034(1)(d) Photo☑ 9130116

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A. See photocopied EAP (6 2008)	Y	662.034(1)(d) Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	N	662.034(1)(d) Photo ☐
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)). fire dept. inspects every six months	N	662.034(1)(d) Photo ☐
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	N	662.034(1)(d) Photo ☐
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	N	662.034(1)(d) Photo ☐
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	N	662.034(1)(d) Photo ☐
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. bullhorn 2. Notify appropriate authorities, if their help is needed. ✓ 3. Identify the character, source, amount, and extent of discharged hazardous materials. N 4. Assess hazards to human health and the environment. N 5. If the incident threatens human health or the environment outside the facility, notify local N authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). N 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. N 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. NA 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. N 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. N 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. N 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days. N	~~TBD~~ N plan photocopied	662.034(1)(d) Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A	N	662.034(1)(d) Photo☐
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).		662.034(1)(d) Photo☐
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).		662.034(1)(d) Photo☐
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.		662.034(1)(d) Photo☐
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).		662.034(1)(d) Photo☐
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).		662.034(1)(d) Photo☐
G. Personnel take part in an annual review of the training (NR 665.0016(3)).		662.034(1)(d) Photo☐
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.		662.034(1)(d) Photo☐
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).		662.034(1)(d) Photo☐

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	 Photo☐
B. Accumulation start date is clearly marked and visible for inspection on each container.	N	662.034(1)(b) Photo☐
C. All containers are clearly marked with the words "Hazardous Waste".	N	662.034(1)(c) Photo☐

Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	NA	662.034(1)(a)1 Photo☐
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	NI	662.034(1)(a)1 Photo☐
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)). 4 drums	N buckets	662.034(1)(a)1 Photo☐
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	N buckets	662.034(1)(a)1 Photo☐
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	N	662.034(1)(a)1 Photo☐
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1 Photo☐
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	NA	662.034(1)(a)1 Photo☐
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	NA	662.034(1)(a)1 Photo☐
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	NA	662.034(1)(a)1 Photo☐

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration >= 10% by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2). 1. Pumps in light liquid service. N 2. Compressors. N 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. N 5. Open-ended valves or lines. N 6. Valves in gas or vapor service or in light liquid service. N 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	N	Photo☐
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).		662.034(1)(a) Photo☐
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).		662.034(1)(a) Photo☐
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).		662.034(1)(a) Photo☐

Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.		662.034(1)(a) Photo ☐
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.		662.034(1)(a) Photo ☐
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).		662.034(1)(a) Photo ☐
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.		 Photo ☐

Section 10: Subchapter CC Level 1 Container Standards

Difficult to complete not knowing VO Concentration

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. Y 2. Greater than 119 gallons and not in light material service.	Y	 Photo ☐
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.		 Photo ☐ volatile organics not determined
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	N	662.034(1)(a)1 Photo ☐
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	 Photo ☐
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	 Photo ☐

Section 10. Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the specific air program compliance requirements for the containers		Photo ☐
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.		Photo ☐
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	Y drums N buckets	662.034(1)(a)1 Photo ☐
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	N buckets	662.034(1)(a)1 Photo ☐
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	NA	662.034(1)(a)1 Photo ☐
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N buckets	662.034(1)(a)1 Photo ☐
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	NA	662.034(1)(a)1 Photo ☐
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	NA	662.034(1)(a)1 Photo ☐
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)1 Photo ☐
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).		662.034(1)(a)1 Photo ☐
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).		662.034(1)(a)1 Photo ☐

Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).	NA	662.034(1)(a)1 Photo ☐

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12. 360 Solvent vapor pressure is 0.21 kPa ↳ kPa > 0.3 for light material service. at room T.	N	Photo ☐
B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a)) 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		662.034(1)(a)2 Photo ☐
C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a)) 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		662.034(1)(a)2 Photo ☐
D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))		662.034(1)(a)2 Photo ☐
E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))		662.034(1)(a)2 Photo ☐
F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)		662.034(1)(a)2 Photo ☐
G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.) 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		662.034(1)(a)2 Photo ☐
H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.) 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		662.034(1)(a)2 Photo ☐
I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)		662.034(1)(a)2 Photo ☐

LARGE QUANTITY GENERATOR INSPECTION

Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		662.034(1)(a)2 Photo ☐
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)		662.034(1)(a)2 Photo ☐
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo ☐
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)		662.034(1)(a)2 Photo ☐

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N	 Photo ☐
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2 Photo ☐
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2 Photo ☐
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2 Photo ☐
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2 Photo ☐

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	 Photo ☐
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a) Photo ☐
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a) Photo ☐
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1 Photo ☐

Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171). drained contents, disposed of container	Y	662.034(3)(a)1 Photo☐
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	N	662.034(3)(a)1 Photo☐
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	N	662.034(3)(a)2 Photo☐
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	NA	662.034(3)(b) Photo☐
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	ND	662.034(3)(b) Photo☐

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e) Photo☐
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan. switched from	Y	662.027(1) Photo☐

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	Photo☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.		679.10(2)(a)2 Photo☐
C. Used oil containers and tanks are in good condition and not leaking. not closed, open buckets	N	679.22(2) Photo☐
D. Used oil containers and tanks are marked "used oil".	N	679.22(3)(a) Photo☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.	Y	679.24 Photo☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	T	Photo☐

LARGE QUANTITY GENERATOR INSPECTION

Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.	NA	679.23 Photo ☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.	NA	679.11 Photo ☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.	N	 Photo ☐
B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.		662.034(7) Photo ☐
C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.		662.034(7)(a) Photo ☐
D. The F006 waste is legitimately recycled through metals recovery.		662.034(7)(b) Photo ☐
E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.		662.034(7)(c) Photo ☐
F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.		662.034(7)(d)1.a Photo ☐
G. The accumulation start date is clearly marked and visible for inspection on each container.		662.034(7)(d)3 Photo ☐
H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.		662.034(7)(d)1.b Photo ☐
I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".		662.034(7)(d)4 Photo ☐
J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.		662.034(7)(d)1.c Photo ☐
K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.		662.034(7)(d)5 Photo ☐
L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.		662.034(8) Photo ☐

Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.	N	662.034(1) Photo ☐
B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)). generation rate not determined by month		Photo ☐
C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).		Photo ☐
D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)): 1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment. 2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.	NA	662.034(1)(a)2 Photo ☐

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